



## WILLIAMSON COUNTY

Rogers C. Anderson, County Executive  
1320 West Main Street, Suite 125  
Franklin, Tennessee 37064  
(615) 790-5700, Fax (615) 790-5818

June 6, 2003

2003 JUN - 6 PM 3: 08

Mr. Barry R. Stephens, Director  
Division of Air Pollution Control  
Department of Environment and Conservation  
401 Church Street  
L & C Annex, 9<sup>th</sup> Floor  
Nashville, Tennessee 37243-1531

RE: Early Action Compact, "Likely Control Measures"


Dear Mr. Stephens:

Per your letter of 20 May '03, attached you will find a list of "Likely Control Measures," a stipulation of Williamson County remaining in the Early Action Compact (EAC). Please be advised that Williamson County reserves the right to disassociate from the EAC in accordance with the terms of the same.

In recent meeting with representatives of several of the municipalities, it was noted that Division of Air Pollution had not directly contacted these jurisdictions regarding the EAC. This finding was particularly disconcerting given the spirit of the various representations made by yourself and employees of Division of Air Pollution Control at recent Metropolitan Planning Organization (MPO) meetings. To date, the only meaningful outreach has occurred via the efforts of the MPO Staff. It is strongly suggested that Division of Air Pollution Control use the time period while the "likely control measures" are being modeled to engage the several municipalities within Williamson County in a meaningful dialogue regarding the EAC.

Williamson County Government and its Municipalities, recognize the importance of clean air to our citizens, and the implications of being designated a "non-attainment area" by EPA. We want to work in partnership with TDEC and the MPO, to identify a process and programs that will benefit all of Middle Tennessee.

Sincerely,

  
Rogers C. Anderson  
County Executive

/cb

## LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx, VOC, CO	M	R	L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC, CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC, CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC, CO	M	V	L and/or S
On-road vehicles	Traffic signalization/synchronization	NOx, VOC, CO	M	V	L
On-road vehicles	Roadside assistance/Incident management program	NOx, VOC, CO	M	V	L
HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC, CO	M	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, VOC, CO	C	V	L and/or S
Open burning	Open burning ban--perhaps on ozone action days	NOx, VOC, CO	S	R	L
On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	M	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC, CO	M	V	L
On-road vehicles	Area wide rideshare incentives	NOx, VOC, CO	M	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC, CO	M	R	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
All gasoline engines	Support lower gasoline RVP	VOC	M	R	S
All diesel engines	Participate in a regional initiative to seek early introduction of ultra-low sulfur diesel fuel	NOX, VOC, CO	M	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOX, VOC, CO	M	R	S
Trip Reductions	Employer-based trip reduction plans	NOX, VOC, CO	M	V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOX, VOC, CO	M	V	L
All	Public education at community events	NOX, VOC, CO	C	V	L
All	Air quality web page/public information	NOX, VOC, CO	C	V	L
OTHERS---					

# LIST OF LIKELY CONTROL MEASURES FOR

Williamson

COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

<u>Roger C. Anderson</u>	<u>County Executive</u>	<u>6 June 2003</u>
NAME	TITLE	DATE

Other signatories are as follows:

NAME	TITLE	DATE
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NAME	TITLE	DATE
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NAME	TITLE	DATE
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NAME	TITLE	DATE
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NAME	TITLE	DATE
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**LIST OF LIKELY CONTROL MEASURES FOR**Williamson**COUNTY NAME**

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Roger C. Anderson County Executive 6 June 2003  
NAME TITLE DATE

Other signatories are as follows:

City of Franklin  
By B. Johnson City Adm. June 3, 2003  
NAME TITLE DATE

NAME TITLE DATE

NAME TITLE DATE

NAME TITLE DATE

NAME TITLE DATE



ANNE DUNN  
MAYOR  
BRIAN J. SWEENEY  
VICE-MAYOR  
MICHAEL W. WALKER  
CITY MANAGER

## City of Brentwood

COMMISSIONERS  
ANNE DUNN  
BRIAN J. SWEENEY  
ROBERT L. HIGGS, P.E.  
JOE REAGAN  
REGINA R. SMITHSON

June 3, 2003

Mr. Barry Stephens, Director  
Division of Air Pollution Control  
Department of Environment and Conservation  
401 Church St.  
L&C Annex, 9<sup>th</sup> Floor  
Nashville TN 37243-1531


Dear Mr. Stephens:

This letter is intended to indicate the City of Brentwood's concurrence with the list of "Likely Control Measures" submitted by Williamson County Executive Rogers Anderson as part of the County's continued participation in the Nashville Area Early Action Compact process.

It is understood that concurrence with this list of Likely Control Measures in no way commits the City of Brentwood to implement any of these measures at this time and that any formal commitment by the City of Brentwood to future implementation of air quality control measures through the Early Action Compact would be subject to a vote of the entire Brentwood Board of Commissioners.

If you have any questions regarding the City's position on this matter, please feel free to contact Assistant City Manager Kirk Bednar at (615) 371-0060.

Sincerely

  
Anne Dunn  
Mayor

FROM : WILLIAMSON COUNTY PLANNING

FAX NO. : 5918531

Jun. 03 2003 03:01PM P6

# LIST OF LIKELY CONTROL MEASURES FOR

Williamson

COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Roger C. Anderson County Executive 6 June 2003  
NAME TITLE DATE

Other signatories are as follows:

C. Cherry B. Jackson Mayor 6 June 2003  
NAME TITLE DATE  
Lowry Thompson Sharon

NAME TITLE DATE

NAME TITLE DATE

NAME TITLE DATE

NAME TITLE DATE



FROM : WILLIAMSON COUNTY PLANNING

FAX NO. : 5918531

Jun. 06 2003 11:50AM P7

JUN-03-03 TUE 09:21 AM CITY of FRANKLIN / ADMIN

FAX NO. 6157800469

P. 02

Jun. 03 2003 09:26AM P6

FROM : WILLIAMSON COUNTY PLANNING

FAX NO. : 5918531

## LIST OF LIKELY CONTROL MEASURES FOR

Williamson

COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Roger C. Anderson County Executive 6 June 2003  
NAME TITLE DATE

Other signatories are as follows:

City of Franklin City Admin. June 3, 2003  
Ray B. Johnson NAME TITLE DATE

Ray W. Lee Mayor 6-6-03  
NAME TITLE DATE

NAME TITLE DATE


NAME TITLE DATE

NAME TITLE DATE

**WILLIAMSON COUNTY**

Community Development  
1320 West Main St., Suite 400  
Franklin, Tennessee 37064  
615-790-5725  
FAX 615-591-8531

**MEMORANDUM**

**TO:** Rogers Anderson, County Executive  
**FROM:** Joe Horne, Community Development Director   
**RE:** Early Action Compact (EAC) Signatories  
**DATE:** 6 June '03

This memorandum will serve as an update as to the signatories to the Early Action Compact (EAC). To date, Williamson County, Franklin, Brentwood, Spring Hill and Thompsons Station have formally indicated their interest in the EAC, and documentation of such has been forwarded to TDEC. To follow is the status of the remaining municipalities:

- **Nolensville-** as you know, Mayor Knapper was unable to attend our meeting of 24 May '03. Your proposed letter and attachments were faxed to Mayor Knapper earlier this week. I have not received a response.
- **Fairview-** no representatives of Fairview attended the meeting of 24 May '03. In a conversation yesterday, City Manager Al Deck acknowledged he was not aware of the EAC or its goals. Further, based on this conversation, it is unlikely that Fairview will commit to the EAC until this matter can be taken up with their Board of Mayor and Aldermen.

At this juncture, none of the municipalities have expressed an unwillingness to participate in the EAC. If/when they choose to do so, their intent shall be forwarded to TDEC.

cc     File

FROM : TOWN OF NOLENSVILLE

FAX NO. : 7763634

Jun. 09 2003 07:57AM P2

Charles F. Knapper  
Mayor

Tommy Dugger  
Alderman

James L. Felts  
Alderman



## Town Of Nolensville

Gail Phillips  
Alderman

Joe Rossi Rositano  
Alderman

Cindy Lancaster  
Town Recorder

June 6, 2003

Mr. Joe Horne, Director  
Williamson County Development  
1320 West Main Street, Suite 400  
Franklin, Tennessee 37064

Dear Joe,

The Nolensville Board of Mayor and Aldermen have unanimously voted to participate in the Early Action Compact with Williamson County.

Please convey to the Metropolitan Planning Office the Town Of Nolensville has agreed as outlined in your previous letter.

Thank you very much for your cooperation in this matter.

Sincerely,

Charles F. Knapper,  
Mayor

Cc: Jeanne Stevens, MPO Coordinator  
Metropolitan Government  
Board of Mayor and Aldermen

ROBERT DEDMAN  
County Executive



RACHEL WARREN  
Assistant/Secretary

## WILSON COUNTY GOVERNMENT

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June 5, 2003

Mr. Barry R. Stephens, P.E.  
Director  
Division of Air Pollution Control  
Tennessee Department of Environment and Conservation

Mr. Stephens,

Re: List of potential control measures that the Wilson County Commission may consider enacting or supporting.

The following is a list of potential control measures that could meet with some favorable consideration from the Wilson County Commission regarding control of air pollution and the pending early action compact agreement (EAC) for the Middle Tennessee Region.

This list should be viewed as a list of those measures which might be considered by the Wilson County Commission. Under no circumstance should they be viewed as a commitment to enact or support any of the measures. Before, the County will be able to abide by an EAC agreement or related control measures; a significant effort must be made on behalf of the Environmental Protection Agency, the Tennessee Department of Environment and Conservation and other interested parties to educate both the County elected officials and the citizens of Wilson County regarding what the issues are that are driving this EAC agreement and what the issues are regarding our air quality and public health. We as county elected officials need to understand clearly the choice we are being asked to make. This choice must be illustrated in simple and concise terminology and the explanation of the choice must also adequately address pros and cons for each means of progressing (i.e. what happens if we continue participating in the EAC and what happens if we don't?). Information I have received and staff reports I have received regarding the pros and cons and regarding recent studies have been confusing and sometimes in conflict with one another. Many important questions have remained unanswered. Finally, it is imperative that the participating municipalities within the MPO be brought up to speed on the early action compact by TDEC and the EPA, if this has not already occurred. It is my opinion that this task should not fall to the various County Executives and County Staffs to try and educate the municipalities within our jurisdiction about this

important subject. I do not have an adequate grasp on all issues surrounding the EAC to sell or even simply educate my County Commission; much less someone else's City Council, about these issues.

With the above being stated, here is a list of control measures that might be considered or supported:

1. **Support evaluation of an Inspection and Maintenance (IM) program EAC-Wide or Statewide.**

Explanations and Opinions: The elected officials that have been in office since this type of program was enacted in our County are not terribly pleased with the program. Much of this displeasure may be related to a lack of education regarding the reasons for the program. They do not relate the air quality concerns to their everyday lives. Of particular concern to many is the fact that Wilson County has been required to participate and other Counties in the region have not. This proposed expansion might gain some favor given its potential for being perceived as an issue of fairness.

2. **Free Gas Cap Replacement program (In conjunction with IM)**
3. **Local Governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles.**

Explanations and Opinions: Only if costs to do so are less than or at least equivalent to traditional fuels, vehicles, and infrastructure.

4. **Support statewide NOx RACT Low NOx combustion controls.**

Explanations and Opinions: If this is referring to controls on heavy industry, the county may support it but we really do not have any local authority to enforce it at this time.

5. **Encourage accelerated replacement with newer lower emitting Vehicles for on road heavy duty diesel vehicles and buses, as well as, for other on- and off-road vehicles.**

Explanations and Opinions: It is my belief that the County Commission might support this issue regarding the County's own fleets if it were cost effective. Secondly, we could support an aging vehicle replacement subsidy for the general citizenry or private sector but some funding source would have to be provided to support this effort.

6. **Retrofitting local government vehicles (Diesel fleets including school buses) with the means to run on alternative fuels like biodiesel with a low NOx additive.**

Explanations and Opinions: See explanation to #3 above.

7. **Traffic Signalization/Synchronization**

Explanations and Opinions: We may support this, but our local impact is perceived as minimal. We do not have many traffic signals within our jurisdiction that are under county control. Most are either State or City controlled.

8. **Roadside Assistance/Incident Management Program**

Explanations and Opinions: We may support, but this is perceived as something more efficiently operated and undertaken by State Department of Transportation as is evidenced by current State program.

9. **Air Quality Action Day**

Explanations and Opinions: This could probably be supported by resolution of the County Commission if they were made aware of the value as related to health and other air quality related concerns.

10. **Transportation Management Plan for Large Employers**

Explanations and Opinions: We may support encouragement of this but really have no local control or authority over this item.

11. **Open Burning Ban – On High Ozone Days**

Explanations and Opinions: We may support, but it would be difficult to enforce given current staffing levels and responsibilities in relation to the 535 square miles encompassed within our County.

12. **Support enforcement of the Smoking Vehicle Regulation similar to one recently adopted in Davidson County.**

Explanations and Opinions: It is assumed that the local Sheriff's Department would enforce this regulation if enacted. If County Commission were adequately educated as to the impacts this could have, they might pass it.

- 13. Participate in a regional initiative to seek early introduction of low sulfur diesel fuels.**

Explanations and Opinions: If this were done through some organization such as the MPO, we might participate.

- 14. Public Education and Outreach**

Explanations and Opinions: The County may be willing to participate in various air quality education programs aimed at students in local schools and aimed at the general public; including educational presentations, web page development, public advertisements, etc.


- 15. Encourage alternative means of Transportation that can reduce the number of pollutant emitters (cars) on the road system.**

Explanations and Opinions: The County already participates to a small extent in these types of efforts. Recently, the respective county commissions and city councils of Wilson County, the City of Lebanon, the City of Mount Juliet, and Metropolitan Nashville/Davidson County all voted to support local funding of a 37,000,000.00 commuter rail project to run between downtown Nashville and Lebanon, Tennessee. Other efforts within Wilson County such as encouragement of greenways and bikeways are progressing at a slower pace.

Other suggested early action measures from your letter, dated May 20, 2003 were perceived to be totally implausible for local implementation or were perceived to be outside of the realm of action, responsibility, or authority that can be expected of local government.

In closing, it is my hope that this letter fulfills the needed requirements to be met regarding continued participation in the development of an early action compact (EAC) for the region. However, I also hope it serves as an illustration of the large task that lies before us in adequately laying out the choices the region must make regarding air quality compliance. If I can be of further assistance, please let me know.

Sincerely,

  
Robert Dedman  
County Executive  
Wilson County, Tennessee